

**Center for Marine Conservation**

July 20, 1993

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Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

Re: Reply Comments to Notice of Proposed Rulemaking to Revise  
Exemptions from Radiotelegraph Equipment Requirements of  
the Communications Act of 1934, FCC NPRM-PR Docket No.  
93-133.

Dear Mr. Secretary:

The Center for Marine Conservation (CMC) supports the comments of the American Radio Association in reply to the above referenced Notice of Proposed Rulemaking. CMC is a nonprofit organization with 110,000 members, dedicated to protecting marine wildlife, and conserving coastal and ocean resources.

CMC opposes expanding the exemption that large cargo and tanker vessels carry radiotelegraph stations and a radio officer. Radio officers serve valuable vessel safety and communications functions, and have been instrumental in preventing and minimizing loss of life and damage to the environment from marine accidents. Eliminating on-board radio officers eliminate communications specialists who can best repair important electronics equipment that could be vital during emergencies. Rather than expanding exemptions to safety requirements, the FCC should be pursuing all measures to ensure the protection of human life and the environment from the effects of accidents and devastating oil spills.

CMC therefore urges the FCC not to implement the proposed expansion to the radio officer exemption.

Thank you for the opportunity to comment.

Very truly yours,

*R. E. McManus*

Roger E. McManus  
President

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cc: rec'd